

APPENDIX 66

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CASE NO. 08-20374-CIV-JORDAN/TORRES

AMERICAN UNIVERSITY OF THE
CARIBBEAN, N.V., a Netherlands Antilles
company, ROBERT BERNAUER, a citizen of
Louisiana, JODIE GWIN, a citizen of Hawaii,
AMIT MISRA, a citizen of California, CALIN
NEAGOE, a citizen of Massachusetts and
VIKRAM SHAKER, a citizen of California,

Plaintiffs,

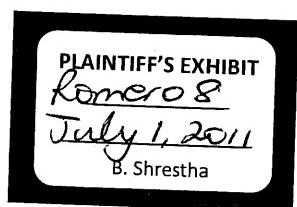
vs.

CARITAS HEALTHCARE, INC., f/k/a
CARITAS HEALTHCARE PLANNING,
INC., a New York corporation, WYCKOFF
HEIGHTS MEDICAL CENTER, a New York
corporation, and BROOKLYN QUEENS
HEALTHCARE, INC., a New York corporation,

Defendants.

NOTICE OF FILING SUPPLEMENTAL DECLARATION OF JULIUS ROMERO

Defendants Caritas Health Care, Inc., Wyckoff Heights Medical Center, and Brooklyn
Queens Health Care, Inc. (collectively, "Defendants"), by and through their undersigned counsel,
hereby give notice of filing the Supplemental Declaration of Julius Romero.



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This 14th day of April, 2008.

PROSKAUER ROSE LLP
Attorneys for Defendants
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Telephone: (561) 241-7400
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By: s/Jonathan Galler
Matthew Triggs
Florida Bar No. 0865745
mtriggs@proskauer.com
Jonathan Galler
Florida Bar No. 0037489
jgaller@proskauer.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 14th day of April, 2008, I electronically filed the foregoing document with the Clerk of Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

s/ Jonathan Galler
Jonathan Galler

Service List

Case No. 08-20374-CIV-JORDAN/TORRES
United States District Court, Southern District of Florida

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CASE NO. 08-20374-CIV-JORDAN/TORRES

AMERICAN UNIVERSITY OF THE
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corporation, and BROOKLYN QUEENS
HEALTHCARE, INC., a New York corporation,

Defendants.

SUPPLEMENTAL DECLARATION OF JULIUS ROMERO

JULIUS ROMERO, upon penalty of perjury, deposes and says that:

1. My name is Julius Romero. I am *sui juris* and make this declaration based upon my own personal knowledge.
2. In my capacity as Assistant Vice President for Medical Education for Defendant Brooklyn Queens Healthcare, Inc. ("BQHC")—which is the sole member of Defendants Caritas Health Care, Inc. ("Caritas") and Wyckoff Height Medical Center ("Wyckoff")—I oversee the clinical clerkship programs at Caritas' two hospitals and at Wyckoff.

3. I respectfully submit this supplemental declaration for the purpose of informing the Court that, for the clinical rotation that commenced today at Caritas' two hospitals, Plaintiff American University of the Caribbean ("AUC") has sent enough students to fill only three of its allotted 50 core clerkship slots and no students at all to fill its allotted five psychiatry clerkship slots.

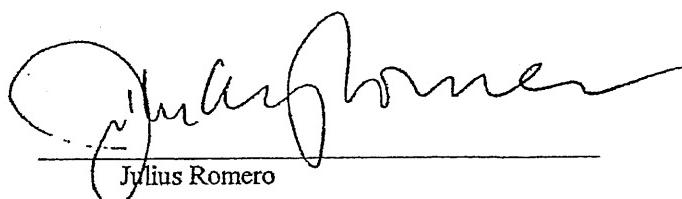
4. (Pursuant to a letter sent to me by AUC on March 14, 2008, I had anticipated that AUC would be sending 23 students to fill its allotted 50 core clerkship slots and five students to fill its allotted psychiatry slots. A copy of that letter is attached hereto as Exhibit A.)

5. In addition, to the three AUC students who showed up at Caritas today, three other AUC students who were not on the March 14, 2008 list showed up as well.

6. Of the six AUC students in total who showed up at Caritas today, I placed three students in elective clerkships at Wyckoff and three students in core clerkships at Wyckoff.

FURTHER DECLARANT SAYETH NAUGHT.

Dated: April 14, 2008



The image shows a handwritten signature in black ink, which appears to be "Julius Romero". Below the signature, there is a horizontal line. Underneath the line, the name "Julius Romero" is printed in a smaller, standard font.

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EXHIBIT A



**American University of the Caribbean
School of Medicine**

14 March 2008

Julius A.C. Romero
Assistant Vice President, Medical Education
Brooklyn Queens Health Care, Inc.
Wyckoff Heights Medical Center
Caritas - Mary Immaculate Hospital
Caritas - St. John's Queens Hospital
374 Stockholm St.
Brooklyn, NY 11237

Re: American University of the Caribbean ("AUC") - Student Clerkship Schedule

Dear Mr. Romero,

Please be advised that the following AUC students are scheduled for clinical clerkships to commence 4/14/08 at Wyckoff Heights Medical Center and the Caritas Health Care hospitals as set out below:

Wyckoff Heights - 4/14/08

Family Medicine - WHMC

- 1) Vinitha Perinando
- 2) Karthick Namala
- 3) Dorota Kowalska
- 4) Christopher Tomaino
- 5) Ryan Pastena
- 6) Ana Solberger
- 7) Jeffrey Yuen
- 8) Scott Suciu

Ob/Gyn - WHMC

- 1) Rachael Girard
- 2) Mary Jane Nowak
- 3) Lauren L'Hommedieu
- 4) Raniyah Kaid
- 5) Francine Hyman
- 6) Vinod Chainani

Pediatrics - WHMC

- 1) Jodie Gwin
- 2) Heath High
- 3) Justin Norris
- 4) Brian Woo
- 5) Selene Cudjoc
- 6) Rae Lynn Kehler

Caritas Health Care - 4/14/08

Medicine - CHC

- 1) Zulaikah Atakozie
- 2) Kevin Ray
- 3) Dietrich Weftman
- 4) Ann Knowles
- 5) Neal Mincey
- 6) Karla Chaffee
- 7) Nicholas Stefanopoulos
- 8) Dikran Orfali

Social Work

- 6) Shai Shoshani
- 7) Richard Strydom

Psychiatry - EHC

- 1) Adam Raskin
- 2) Anna Lafontant
- 3) David Wagner

Family Medicine - CHC

None scheduled

Surgery - CHC

- 1) Amit Misra
- 2) Vikram Shaker
- 3) Ryan Braun
- 4) Aja Morringstar
- 5) Calum Neagie
- 6) Kong Truong
- 7) Chad Gorman
- 8) Flavia Mallette

Ob/Gyn - CHC

- 1) DeAndra Davis
- 2) Jason Nguyen
- 3) Wendy Masterman
- 4) Matthew Lobo

Medical Education Administrative Services

901 Ponce De Leon Blvd, Ste 401 • Coral Gables, FL 33134 • Ph 305 446 0600 • Fx 305 444 6791 • Toll Free 866-DR2B AUC
www.aucmed.edu

Please note that, subject to pending negotiations, the American University of the Caribbean expects that these students will be allowed to commence their clerkships pursuant to the agreements currently in effect between the parties.

Your confirmation of the above would be appreciated.

Regards,



Cynthia A. Holden, J.D.
Authorized House Counsel*

* member of California Bar Association and New Zealand Law Society only